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Attorneys for Plaintiff, Deutsche Bank National Trust Company as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2006-NC5, Mortgage Pass-Through Certificates, Series 2006-NC5

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE FOR MORGAN
STANLEY ABS CAPITAL I INC. TRUST
2006-NC5, MORTGAGE PASS-THROUGH
CERTIFICATES SERIES 2006-NC5

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE
COMPANY, INC. and ROE CORPORATIONS
XI through XX, inclusive.

Defendants.

Case No.: 2:22-cv-00547-GMN-BNW

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
[ECF NO. 41]**

(First Request)

COMES NOW, Plaintiff, Deutsche Bank National Trust Company as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2006-NC5, Mortgage Pass-Through Certificates, Series 2006-NC5 (“Deutsche Bank”) and Defendant Doma Title Insurance F/K/A North American Title Insurance Company (“NATIC”, collectively, the “Parties”), by and through their respective undersigned counsels, stipulate and agree as follows:

1. On March 5, 2024, NATIC filed a Motion to Dismiss [ECF No. 41];
 2. Deutsche Bank's deadline to respond to NATIC's Motion to Dismiss is currently March 19, 2024;

- 1 3. Deutsche Bank's counsel is requesting a brief two-week extension until April 2, 2024,
2 to provide additional time for counsel to review and respond to the points and
3 authorities cited to in the pending Motion;
4 4. Counsel for NATIC does not oppose the requested extension;
5 5. This is the first request for an extension and is made in good faith and not for purposes
6 of undue delay or prejudice.

7 **IT IS SO STIPULATED.**

8 DATED this 18th day of March, 2024.

9 WRIGHT, FINLAY & ZAK, LLP

10 /s/ Yanxiong Li, Esq.

11 Yanxiong Li, Esq.
12 Nevada Bar No. 12807
13 7785 W. Sahara Ave., Suite 200
14 Las Vegas, NV 89117
15 *Attorneys for Plaintiff, Deutsche Bank
National Trust Company as Trustee for
Morgan Stanley ABS Capital I Inc. Trust
2006-NC5, Mortgage Pass-Through
Certificates, Series 2006-NC5*

16 DATED this 18th day of March, 2024.

17 SINCLAIR BRAUN KARGHER LLP

18 /s/ Kevin S. Sinclair, Esq.

19 Kevin S. Sinclair, Esq.
20 Nevada Bar No. 12277
21 15260 Ventura Blvd., Ste 715
22 Sherman Oaks, California 91403
23 *Attorneys for Defendant, Doma Title
Insurance F/K/A North American Title
Insurance Company, Inc.*

24 **IT IS SO ORDERED.**

25 DATED: March 18, 2024

26 
27 DISTRICT COURT JUDGE